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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**CALISTA ENTERPRISES LTD**, a  
Republic of Seychelles Company,

Plaintiff,

v.

**TENZA TRADING LTD.**, a Cyprus  
Company,

Defendant.

No. 3:13-cv-01045-SI

JOINT STIPULATED MOTION TO EXTEND  
DEADLINES FOR RESPONSES TO  
PARTIES' SUMMARY JUDGMENT  
MOTIONS

**TENZA TRADING LTD.**, a Cyprus  
Company,

Counterclaim Plaintiff,

v.

**CALISTA ENTERPRISES LTD**, a  
Republic of Seychelles Company; and  
**ALEXANDER ZHUKOV**, A  
Czechoslovakian citizen,

Counterclaim Defendants.

Tenza Trading Ltd. (hereafter “Tenza”) and Calista Enterprises, Ltd. (hereafter “Calista”) submit the following stipulated motion.

#### **Local Rule 7.1 Certification**

The undersigned counsel certify that the motion at issue is stipulated by counsel.

#### **Motion**

The parties request a two-day extension of the currently set deadline for responses to dispositive motions.

The responses to dispositive motions for this matter are currently due on Monday, July 7, 2014. Because of the holiday weekend of Independence Day and the press of additional motions being briefed simultaneously during this time, the parties have stipulated, and hereby respectfully request, that the deadline for responses to dispositive motions be continued two days, making the deadline for responses Wednesday, July 9, 2014.

Consistent with LR 16-3, this motion is made jointly in good faith and not for purposes of delay. The requested extension will not require any modifications to any other case management

dates that have been set by the Court.

Dated this 3<sup>rd</sup> day of July, 2014.

Respectfully submitted,

s/ Devon Zastrow Newman

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